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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

CASE NO.

3-24CR-533

v.

DLUBAK GLASS COMPANY

INFORMATION

The United States Attorney for the Northern District of Texas and the Assistant Attorney General for the Environmental and Natural Resources Division of the U.S. Department of Justice charge:

Count One

False Statements to Federal Agencies and Agents
[Violation of 18 U.S.C. § 1001(a)(2)]

From on or about March 11, 2016, to on or about May 11, 2016, in the Northern District of Texas and elsewhere, Dlubak Glass Company, acting through its agents and employees, did knowingly and willfully make materially false statements in a matter within the jurisdiction of the Environmental Protection Agency by falsely representing to the Texas Commission on Environmental Quality ("TCEQ") the source, composition, and characteristics of several thousand tons of crushed cathode-ray tube ("CRT") glass that was being stored at the defendant's place of business in the Northern District of Texas. That is, the defendant represented to the TCEQ that the crushed glass was composed of CRT panels containing no lead, when in truth and in fact, as defendant well knew, it contained glass from CRT funnels, which contained significant levels of lead.

In violation of 18 U.S.C. § 1001(a)(2).

LEIGHA SIMONTON
UNITED STATES ATTORNEY



MYRIA BOEHM
Assistant United States Attorney
Texas State Bar No. 24069949
1100 Commerce Street, Third Floor
Dallas, Texas 75242
Tel: (214) 659-8600
Fax: (214) 659-8812
Email: myria.boehm@usdoj.gov

TODD KIM
ASSISTANT ATTORNEY GENERAL
ENVIRONMENT AND NATURAL RESOURCES DIVISION

LAUREN D. STEELE
Trial Attorney
NY State Bar No. 4416814
Lauren.steele@usdoj.gov
(202) 305-0897

GARY N. DONNER
Senior Trial Attorney
NY State Bar No. 2650265
Gary.Donner@usdoj.gov
(202) 305-0338
Environmental Crimes Section
United States Department of Justice
150 M Street NE
Washington, DC 20002